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**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WASHINGTON**

In re:	Case No. 18-03197 FPC 11
GIGA WATT, Inc., a Washington corporation,	The Honorable Frederick P. Corbit
Debtor.	Chapter 7

MARK D. WALDRON, as Chapter 7 Trustee,	Adv. Case No. 20-80031
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Plaintiff,

vs.

PERKINS COIE LLP, a Washington limited liability partnership,
LOWELL NESS, individual and California resident, GIGA WATT PTE., LTD., a Singapore corporation, and ANDREY KUZENNY, a citizen of the Russian Federation,

Defendants,

- and -

THE GIGA WATT PROJECT, a partnership,

Nominal Defendant.

NOTICE OF ERRATA RE TITLE OF AMENDED VERIFIED COMPLAINT FOR (I) BREACH OF FIDUCIARY DUTY TO GIGA WATT, INC., (DEFENDANT PERKINS COIE LLP AND LOWELL NESS) (II) AIDING AND ABETTING GIGA WATT PTE. LTD.'S BREACH OF FIDUCIARY DUTY TO GIGA WATT (DEFENDANT PERKINS COIE LLP AND LOWELL NESS), (III) BREACH OF FIDUCIARY DUTY TO GIGA WATT (DEFENDANT GIGA WATT PTE. LTD.)AND (IV) AIDING AND ABETTING BREACH OF FIDUCIARY DUTY (DEFENDANT ANDREY KUZENNY)

1 Mark D. Waldron, as the Chapter 7 Trustee in the above-captioned main
2 case and in such capacity the Plaintiff in the above-captioned adversary
3 proceeding, hereby submits this Notice of Errata:

4 1. The caption of the Verified Complaint [[ECF No. 6](#)] incorrectly stated
5 that the Verified Complaint was amended. The Verified Complaint was not
6 amended. Instead, the redaction of the Verified Complaint was corrected.
7 Therefore, “Amended,” in the caption should read, “ [Redaction Corrected].”

8 2. The caption of the Verification of Amended Complaint [[ECF No. 7](#)]
9 should read Verification of [Redaction Corrected] Complaint.

10 Dated: November 20, 2020

POTOMAC LAW GROUP PLLC

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12 By: /s/ Pamela M. Egan
13 Pamela M. Egan (WSBA No. 54736)
14 *Attorneys for Mark D. Waldron, Chapter 7*
15 *Trustee, Plaintiff*
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